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19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**

21 BERNADINE GRIFFITH, et al.,  
22 individually and on behalf of all  
23 others similarly situated,  
Plaintiffs,

24 vs.

25 TIKTOK, INC., a corporation;  
26 BYTEDANCE, INC., a corporation  
27 Defendants.

CASE NO. 5:23-cv-00964-SB-E

**SUPPLEMENTAL DECLARATION  
OF Y. GLORIA PARK**

**REDACTED VERSION OF  
DOCUMENT PROPOSED TO BE  
FILED UNDER SEAL**

1 I, Y. Gloria Park, hereby declare under penalty of perjury that the following is  
2 true and correct:

3 1. I am over the age of twenty-one (21) years and employed as an associate  
4 at Susman Godfrey L.L.P. and counsel of record of Plaintiffs in the above-captioned  
5 litigation. I submit this Declaration in Support of Plaintiffs' Second Motion to  
6 Enforce Court Order and for Evidentiary Sanctions filed concurrently with this  
7 declaration.

8 2. I am competent to testify to the matters stated in this Declaration and  
9 have personal knowledge of the facts and statements in this Declaration.

10 3. On April 24, 2024, I sent an email to Defendants' counsel proposing that  
11 the parties meet and confer to "begin discussing a stipulation that addresses the issues  
12 caused by Defendants' ongoing deletion of non-TikTok user data collected through  
13 the TikTok SDK." To date, Defendants have not responded to this offer. Attached as  
14 **Exhibit 9** is my April 24, 2024 email to Defendants' counsel.

15 4. Attached as **Exhibit 10** is a true and correct copy of document with  
16 starting Bates number TIKTOK-BG-000118399, produced on March 1, 2024. The  
17 third page identifies data table "[REDACTED],"  
18 the same data table that Defendants say they identified after the Court issued its  
19 March 18, 2024 Order. Defendants designated this document ATTORNEYS' EYES  
20 ONLY under the Protective Order, and Plaintiffs will apply to file this document  
21 under seal.

22 5. Attached as **Exhibit 11** is a true and correct copy of Defendants' counsel  
23 Kelly Yin's March 1, 2024 production correspondence, which shows that TIKTOK-  
24 BG-000118399 was produced on March 1, 2024.

25 6. Based on Plaintiffs' counsel's and Plaintiffs' experts' review of  
26 Defendants' April 15, 2024 data production, it contains data associated with TikTok  
27 users and data that appears to have been collected from bots and crawlers.  
28

Executed in New York, New York, on the 2<sup>nd</sup> day of May, 2024.

/s/ Gloria Park  
Gloria Park